William H. Du Bois, SBN 46111 1 Traback, Du Bois, & Ikuma 2 5674 Stoneridge Drive, Suite 201 Pleasanton, California 94588 3 Ph. (925) 463-3311 Fax (925) 463-3818 4 5 6 7 8 UNITED STATES DISTRICT COURT 9 NORTHERN DISTRICT OF CALIFORNIA 10 OAKLAND DIVISION 11 12 UNITED STATES OF AMERICA,) Case No. CR11-00035-PJH 13 STIPULATION FOR ORDER **Plaintiff** 14 RELEASING PASSPORT AND **ALLOWING DEFENDANT TO** VS. 15 TRAVEL AND [PROPOSED] ORDER 16 SOMPOL CHALOEICHEEP, 17 Defendant. 18 19 20 21 22 23 GOOD CAUSE APPEARING, IT IS HEREBY STIPULATED by the 24 parties through their counsel that defendant Sompol Chaloeicheep may travel to Las 25 Vegas for three (3) days, in order to attend his best friend's wedding and the surrounding 26 events, leaving this District on or after February 18, 2011, and returning no later than 27 February 20, 2011, and then to travel to China for ten (10) days to conduct business in the 28

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cities of Shanghai and Kunshan, leaving this District on or after February 25, 2011, and returning no later than March 6, 2011, in light of the following facts:

- 1. U.S. Pre-Trial Services is currently supervising Mr. Chaloeicheep. To date, Mr. Chaloeicheep has fulfilled all the conditions of his pre-trial release since his arrest in this matter. He has voluntarily and consistently appeared at every court appearance without fail. This is his first request for travel since his arrest.
- 2. Mr. Chaloeicheep would like permission form this court to travel to and from Las Vegas, Nevada to attend his best friend's wedding from February 18, 2011, through February 20, 2011, and to travel to China for ten (10) days to conduct business in the cities of Shanghai and Kunshan, from February 25, 2011, through March 6, 2011. He has already booked the flights and hotel for the Las Vegas trip, and his employer has already booked the flights and hotels for the China trip. He is thus prepared to, and will, provide all documentation of his itinerary for both trips to Pretrial Services.
- 3. Assistant United States Attorney, Stephen Corrigan, the prosecutor assigned to this matter, has no objection to the requested travel.
- 4. Mr. Paul Mamaril, who is the U.S. Pretrial Services Officer currently supervising Mr. Chaloeicheep, has received Mr. Chaloeicheep's full itinerary and proof of his employment, and does not have any objection to the requested travel as long as Mr. Chaloeicheep complies with the terms of the proposed order.
- 5. Mr. Chaloeicheep, prior to his travel, will meet with Pretrial Services and provide all requested information regarding travel arrangements, including his itinerary and contact information where he may be reached in each destination during his stay there. In addition, Mr. Chaloeicheep is to communicate with Pretrial Services as directed by the supervising Pretrial Services Officer.
- 6. The clerk of the Court will return Mr. Chaloeicheep's passport to him or his attorney forthwith and Mr. Chaloeicheep or his attorney is will return that passport to the Clerk as soon as possible upon his return.

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1	7. All other terms ar	nd conditions of Mr. Chaloeicheep's release shall
2	remain the same.	
3	SO STIPULATED.	
4	Dated: 2/15/11	/s/
5		William Du Bois,
6		Attorney for Defendant,
7		SOMPOL CHALOEICHEEP
8		
9	Dated:	/s/
10		Stephen Corrigan,
11		Assistant United States Attorney
12	SO ORDERED.	
13		1 PC
14	DATED: February 17, 2011	
15		HONORABLE LAUREL BEELER,
16		United States District Judge
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